

1 Wendy M. Krincek  
Nevada Bar No. 6417  
2 LITTLER MENDELSON, P.C.  
3960 Howard Hughes Parkway  
3 Suite 300  
Las Vegas, Nevada 89169.5937  
4 Telephone: 702.862.8800  
Fax No.: 702.862.8811  
5 [wkrincek@littler.com](mailto:wkrincek@littler.com)

6 Attorneys for Defendant  
7 VALLEY HEALTH SYSTEM LLC

8 UNITED STATES DISTRICT COURT  
9 DISTRICT OF NEVADA

10 MATTHEW CHAVEZ, An Individual,

11 Plaintiff,

12 v.

13 VALLEY HEALTH SYSTEM, a dba of UHS  
of Delaware, Inc. a Foreign Corporation DOES  
14 1-50, inclusive and ROE CORPORATIONS 1-  
50, inclusive,

15 Defendants.

Case No. 2:23-cv-00521-MMD-EJY

**STIPULATION TO EXTEND TIME  
FOR DEFENDANT TO FILE A  
RESPONSIVE PLEADING TO  
PLAINTIFF'S COMPLAINT**

**[FIRST REQUEST]**

17 Plaintiff MATTHEW CHAVEZ ("Plaintiff") and Defendant VALLEY HEALTH  
18 SYSTEM LLC<sup>1</sup> ("Defendant"), by and through their undersigned counsel, hereby stipulate to  
19 extend the time for Defendant to file a response to the Complaint by two weeks from the current  
20 deadline of July 5, 2023, up to and including **July 19, 2023**.

21 This extension is necessary to provide adequate time for defense counsel to investigate the  
22 facts of this matter and to prepare a response to the Complaint. In addition, the parties are in the  
23 process of determining whether they will stipulate to arbitrate this matter or if Defendant will file  
24 a motion seeking to compel arbitration.

25 ///

26 ///

27 ///

28 <sup>1</sup> Defendant's proper name is Valley Health System LLC.

1 This is the first request for an extension of time to respond to the Complaint. This request is  
2 made in good faith and not for the purpose of delay.

3 RANDAZZA LEGAL GROUP, PLLC

LITTLER MENDELSON, P.C.

4  
5 /s/ Jenny Foley, Ph.D., Esq.  
6 Jenny Foley, Ph.D., Esq.

/s/ Wendy M. Krincek, Esq.  
Wendy M. Krincek, Esq.

7 Attorney for Plaintiff  
MATTHEW CHAVEZ

Attorney for Defendant  
VALLEY HEALTH SYSTEM LLC

8  
9 **IT IS SO ORDERED.**

10 Dated: June 29, 2023

11  
12   
13 UNITED STATES MAGISTRATE JUDGE

14 4888-2247-6141.1 / 069080-1000